

VIA ECF

July 12, 2023

The Honorable Ona T. Wang
United States Magistrate Judge for the
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *JPMorgan Chase Bank, National Association, London Branch v. Tesla, Inc.*,
No. 1:21-cv-09441-PGG-OTW (S.D.N.Y.)

Dear Judge Wang:

Plaintiff JPMorgan Chase Bank, National Association, London Branch (“JPMorgan”) and Defendant Tesla, Inc. (“Tesla”), by and through their respective undersigned counsel, write pursuant to Section I(e) of Your Honor’s Individual Rules and Practices in Civil Cases to respectfully request an extension of the current case deadlines as set forth in Exhibit 1 attached hereto.

Respectfully submitted,

/s/ Frances E. Bivens

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By: /s/ Jonathan E. Pickhardt

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Attorneys for Defendant Tesla, Inc.

Exhibit 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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		:
JPMORGAN CHASE BANK, NATIONAL		:
ASSOCIATION, LONDON BRANCH,		:
	Case No. 1:21-cv-09441-PGG-OTW	:
Plaintiff,		:
		:
- against -	STIPULATION AND	:
	[PROPOSED] ORDER	:
TESLA, INC.,	REGARDING CASE	:
	DEADLINES	:
Defendant.		:
		:
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WHEREAS, Plaintiff JPMorgan Chase Bank, National Association, London Branch (“JPMorgan”) and Defendant Tesla, Inc. (“Tesla,” and together with JPMorgan, the “Parties”) conferred regarding a modified case schedule after the status conference held on May 11, 2023;

WHEREAS, JPMorgan and Tesla have agreed to modify the case schedule as set forth below;

WHEREAS, the Parties previously requested an extension of these deadlines on February 24, 2023;

WHEREAS, Magistrate Judge Wang so-ordered the Parties' Stipulation and Proposed Order Regarding Case Deadlines on February 27, 2023;

ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for the Parties that the following case deadlines shall apply:

1. **Privilege Logs.** The Parties shall exchange any supplemental privilege logs by **July 20, 2023**. The deadline for exchange of privilege logs was **April 28, 2023**.

2. **Requests for Admission.** The Parties shall serve all requests for admission by **December 15, 2023**. The current deadline for service of requests for admission is **August 4, 2023**.
3. **Fact Discovery.** All fact discovery, including depositions and third-party discovery, shall conclude by **December 15, 2023**. The current deadline for completion of fact discovery is **August 4, 2023**.
4. **Affirmative Expert Disclosures and Reports.** The Parties shall make their affirmative expert disclosures and exchange affirmative expert reports by **February 1, 2024**. The current deadline for affirmative expert disclosures and exchange of affirmative expert reports is **August 31, 2023**.
5. **Rebuttal Expert Disclosures and Rebuttal Reports.** The Parties shall make their rebuttal expert disclosures and exchange rebuttal expert reports by **March 7, 2024**. The current deadline for rebuttal expert disclosures and exchange of rebuttal expert reports is **September 29, 2023**.
6. **Reply Expert Reports.** The Parties shall exchange their reply expert reports by **March 28, 2024**. The current deadline for reply expert reports is **October 20, 2023**.
7. **Completion of Expert Discovery.** All expert discovery, including depositions, shall conclude by **April 19, 2024**. The current deadline for completion of expert discovery is **November 10, 2023**.

SO STIPULATED AND AGREED.

Dated: July 12, 2023

DAVIS POLK & WARDWELL LLP

By: /s/ Frances E. Bivens

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Attorneys for Defendant Tesla, Inc.

IT IS SO ORDERED

Date: _____

Hon. Ona T. Wang
United States Magistrate Judge